

1 **BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION**

2 **DIRECT TESTIMONY OF RONALD W. MILLS**

3 **ON BEHALF OF**

4 **AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.**

5 **AND TCG MIDSOUTH, INC.**

6 **DOCKET NO. 2000-465**

7 **FEBRUARY 6, 2001**

8

9 **Q. PLEASE STATE YOUR NAME AND ADDRESS.**

10 **A.** My name is Ronald Mills. My business address is 1200 Peachtree
11 Street, NE, Atlanta, Georgia 30309.

12

13 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

14 **A.** I am employed by AT&T Corp. ("AT&T") as a District Manager within the
15 Law and Government Affairs organization. In this capacity, I provide
16 support to AT&T business units on technical issues related to network
17 matters and their relationship to the Federal Communications Commission
18 and state public utility commission orders. My current involvement supports
19 the identification and resolution of physical interconnection issues such as
20 hot cut loop provisioning and collocation issues with BellSouth as well as
21 other issues as they arise in interconnection negotiations.

22

1 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND**
2 **EXPERIENCE.**

3 **A.** I hold a BA in Human Resource Administration from St. Leo College, a
4 Masters in Technology Management from the Georgia Institute of
5 Technology and a Master's Certificate in Commercial Project Management
6 from George Washington University. I also hold certifications as an
7 electrician and project manager. I have worked for AT&T for the past 27
8 years. My AT&T job experience includes assignments in Network
9 Operations Central Offices, Data Processing, Marketing, Engineering, and
10 Environment, Health and Safety.

11 In Network Operations, I was responsible for maintaining, testing,
12 and repairing private line and switched telephone equipment. As a Data
13 Processing Associate, I was responsible for managing batch and on-line
14 systems data processing programs for the Atlanta Corporate data center. I
15 performed duties as a troubleshooter to identify and repair hardware and
16 software errors. My data processing specialty was Job Control Language
17 debugging.

18 As a Marketing Administrator, I assisted various National Account
19 teams with technical support for customer presentations and service analysis.
20 I also provided National Account Team technical support for voice products,
21 sales and services.

22 Within AT&T engineering, I have held several assignments. I
23 successfully transitioned the BellSouth Message TIRKS database to AT&T's

1 Toll Connect Engineering. Later, I developed and wrote start-up methods
2 and procedures for the Atlanta Toll Connect group.

3 I served as National Account Engineering Manager for the Federal
4 Express National Account. I was also responsible for coordination of all
5 projects (Voice/Data). While performing as a Customer Service Engineer –
6 Switched Services Coordination, I coordinated the implementation of private
7 switched networks, working closely with the Local Exchange Companies.

8 Then, I served as Service Node Engineer, where I managed three
9 regions (eighteen states) to provide Nodal and Hybrid services via T1.5
10 services and access. I was a Project Manager and provided subject matter
11 expertise for planning, coordination, and implementing projects that added
12 capacity or features to the AT&T World Wide Intelligent Network.

13

14 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

15 **A.** In my testimony, I address Issue 16: whether the criminal background check
16 requirement that BellSouth seeks to impose on AT&T's employees or agents
17 seeking access to collocated space in BellSouth premises is appropriate.

18

19 **COLLOCATION SECURITY – (ISSUE 16)**

20 **Q. WHAT RESTRICTIONS HAS BELL SOUTH PROPOSED ON AT&T'S**
21 **ABILITY TO ALLOW ITS EMPLOYEES AND AGENTS TO ACCESS**
22 **ITS COLLOCATION SPACE?**

23 **A.** BellSouth demands that AT&T certify that criminal background checks have
24 been conducted on each person AT&T wishes to assign to a BellSouth

1 premise. Any person with a record of a felony conviction would be
2 precluded from entry. BellSouth also would require that AT&T seek
3 permission before assigning to work in AT&T's collocation space any person
4 whose record reflects a misdemeanor conviction.

5

6 **Q. IS THIS A REASONABLE REQUIREMENT?**

7 **A.** No. BellSouth's requirement is excessive. AT&T has agreed to reasonable
8 steps to ensure the safety of BellSouth's property. AT&T has assured
9 BellSouth that any AT&T representatives accessing collocation space will be
10 bonded and that AT&T will indemnify BellSouth for any damage resulting
11 from activities of an AT&T employee or agent. AT&T has also attempted to
12 meet BellSouth's demands by offering to perform criminal background
13 checks on employees who have been working for AT&T for less than two
14 years. BellSouth rejected the offer.

15

16 **Q. IS BELLSOUTH'S PROPOSAL ENUMERATED IN THE FCC RULES**
17 **AS A REASONABLE SECURITY ARRANGEMENT?**

18 **A.** No. *See Advanced Services Order*, FCC 99-48 ¶ 48. The reasonable
19 arrangements include security cameras, restricted access and other
20 monitoring systems. The BellSouth facilities that contain collocation space
21 to which AT&T representatives need access are equipped with some or all of
22 these reasonable security measures. There is no indication that requiring
23 criminal background checks will improve security. Indeed, BellSouth
24 admitted in discovery that AT&T employees have had access to collocation

1 space in BellSouth facilities for several years without any incident involving
2 intentional damage to BellSouth's network.

3

4 **Q. WHAT IS AT&T RECOMMENDING?**

5 **A.** AT&T is recommending that the KPSC allow BellSouth to impose only
6 reasonable security arrangements, such as those listed in the FCC's *Advanced*
7 *Services Order*, to protect its equipment and ensure network security and
8 reliability.

9

10 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

11 **A.** Yes.